

UNITED STATES BANKRUPTCY COURT  
DISTRICT OF NEW JERSEY

Caption in Compliance with D.N.J. LBR 9004

**McDonnell Crowley, LLC**

115 Maple Avenue

Red Bank, NJ 07701

(732) 383-7233

bcrowley@mchfirm.com

Brian T. Crowley

*Counsel to John M. McDonnell,*

*Chapter 7 Trustee*

In re:

LOG STORM SECURITY, INC.

Debtor.

Case No. 21-12043 (MBK)

Honorable Michael B. Kaplan

Chapter 7

Recommended Local Form:

☒ Followed

☐ Modified

**APPLICATION FOR RETENTION OF SPECIAL COUNSEL  
AND CERTIFICATE OF COMPLIANCE WITH D.N.J. LBR 2014-1(a)**

1. The applicant, John M. McDonnell, is the

☒ Trustee: ☒ Chap. 7 ☐ Chap. 11 ☐ Chap. 13.

☐ Debtor: ☐ Chap. 11 ☐ Chap. 13

☐ Official Committee of \_\_\_\_\_

2. The applicant seeks to retain the following professional, Richard J. Corbi, Esq. ("Corbi") to serve as:

☐ Attorney for: ☐ Trustee ☐ Debtor-in-Possession

☐ Official Committee of \_\_\_\_\_

☐ Accountant for: ☐ Trustee ☐ Debtor-in-possession

☐ Official Committee of \_\_\_\_\_

☒ Other Professional:

☐ Realtor ☐ Appraiser ☒ Special Counsel

☐ Auctioneer ☐ Other (specify): \_\_\_\_\_

3. The employment of the professional is necessary because the Trustee requires counsel to render legal services in connection with litigation, including but not limited to, avoidance actions under the Bankruptcy Code and applicable state law, as well as other potential claims of the estate and related issues with secured creditors (the "Litigation").
4. The professional has been selected on the basis of its considerable experience in bankruptcy litigation matters. The Trustee believes that Corbi is well qualified to serve as special counsel in this Chapter 7 case.
5. The professional services to be rendered are as follows:

Represent the Chapter 7 Trustee in regards to litigation, including but not limited to, avoidance actions under the Bankruptcy Code and applicable state law, as well as other potential claims of the estate and related issues with secured creditors.

6. The proposed arrangement for compensation is as follows:

The fees charged by Corbi in connection with the Litigation are thirty (30) percent of any settlement or recovery realized for the Debtor's estate after reimbursement to the firm for all reasonable out-of-pocket costs and expenses pursuant to N.J. Court Rule 1:21-7. If there is no recovery made, then special counsel is not entitled to reimbursement as described above.

7. To the best of the applicant's knowledge, the professional's connection with the debtor, creditors, any other party in interest, their respective attorneys and accountants, the United States Trustee, or any person employed in the office of the United States Trustee, is as follows:

☒ None

☐ Describe connection:

8. To the best of the applicant's knowledge, the professional (check all that apply):

☒ does not hold an adverse interest to the estate.

☒ does not represent an adverse interest to the estate.

☒ is a disinterested person under 11 U.S.C. § 101(14).

☒ does not represent or hold any interest adverse to the debtor or the estate with respect to the matter for which he/she will be retained under 11 U.S.C. § 327(e)

☐ Other; explain:

---

---

---

9. If the professional is an auctioneer, appraiser or realtor, the location and description of the property is as follows:

---

---

Wherefore, the applicant respectfully requests authorization to employ the professional to render services in accordance with this application, with compensation to be paid as an administrative expense in such amounts as the Court may hereafter determine and allow.

Dated: September 10, 2021

/s/ John M. McDonnell

Signature of Applicant

John M. McDonnell, Chapter 7 Trustee

Name of Applicant

- and -

**McDonnell Crowley, LLC**

*Counsel to Chapter 7 Trustee*

By: /s/ Brian T. Crowley

Brian T. Crowley

**CERTIFICATE OF COMPLIANCE WITH D.N.J. LBR 2014-1(a)**

I have complied with D.N.J. LBR 2014-1(a) by mailing a copy of this application to all the following who did not receive electronic notice from the Court: the United States Trustee, the Debtor and/or Debtor's attorney, the Trustee (as applicable), the secured creditors, the Official Committees (as applicable), and others requesting notice, all of whose addresses are shown on the attached service list, by regular mail, postage prepaid, within one (1) day after filing with the Court.

Dated: September 10, 2021

Signed /s/ Brian T. Crowley  
Brian T. Crowley